

# Exhibit B

**From:** Ray, Christine Mullen <cray@paulweiss.com>

**Sent:** Wednesday, December 13, 2023 6:23 PM

**To:** London, Sarah R. <slondon@lchb.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Roopal Luhana <Luhana@chaffinluhana.com>

**Cc:** Atkins, Robert A <rkatkins@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Keller, Andrea M <akeller@paulweiss.com>; Moseley, Sarah E <smoseley@paulweiss.com>

**Subject:** MDL 3084 - Follow Up on PTO #2 & Motion to Enforce

Counsel:

Thank you for the meet and confer today.

With respect to issues raised by Plaintiffs in relation to PTO #2 and Plaintiffs' anticipated motion to enforce, Plaintiffs stated that they believe Uber is required to disclose additional information regarding noncustodial data sources based on Paragraph 3 of PTO #2. As previously disclosed to Plaintiffs in this matter, there are several thousand current and former Uber employees who are subject to litigation holds (for various matters) and whose electronic custodial data is thus being preserved. Even though that disclosure is more than is required under PTO #2 or applicable law, we have made it as a show of Uber's commitment to a good faith exchange of information to address Plaintiffs' concerns. With respect to Plaintiffs' questions regarding noncustodial data sources, again, we do not believe further disclosures are required beyond the disclosures that we have already made that Uber is complying with the requirements of PTO #2. However, again, in good faith and the spirit of compromise to address the concerns that Plaintiffs stated - - and without waiving any applicable privileges or protection related to litigation holds that have been issued in this case or others - - Uber affirms that thousands of employees have been placed on hold in connection with this litigation in particular. The individuals who have been placed on hold with respect to this litigation have been advised that the hold for this matter applies to the data sources listed in Paragraph 3, and copies of PTO #2 were transmitted to those thousands of employees. As to additional noncustodial databases and sources of data, Uber again states that it is taking appropriate preservation steps consistent with the terms of PTO #2.

We trust that this resolves the concerns raised, and we remain available to meet and confer.

Best,  
Christine

**Christine Mullen Ray** | Associate

**Paul, Weiss, Rifkind, Wharton & Garrison LLP**

1285 Avenue of the Americas | New York, NY 10019-6064

+1 212 373 3246 (Direct Phone) | +1 212 492 0246 (Direct Fax)

[cray@paulweiss.com](mailto:cray@paulweiss.com) | [www.paulweiss.com](http://www.paulweiss.com)

*Pronouns: She/Her*

This message is intended only for the use of the Addressee and may contain information that is privileged and confidential. If you are not the intended recipient, you are hereby notified that any dissemination of this communication is strictly prohibited. If you have received this communication in error, please erase all copies of the message and its attachments and notify us immediately.